

**UNITED STATES DISTRICT COURT  
FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**  
**Plaintiff,**

V.

**\$19,629.00 IN U.S. CURRENCY  
Defendant**

**CIVIL ACTION NO. 4:10-CV-01218**

## **ANSWER TO VERIFIED COMPLAINT FOR FORFEITURE IN REM**

Jorfui Dolly Kandeh, by and through her attorney of record, Craig Pena, files this Answer to Verified Complaint for Forfeiture In Rem, and shows unto the Court:

1. Admit this is an action for forfeiture brought under 31 U.S.C. § 5317(c)(2) but deny this is a proper cause of action.

2. Admit factual scenario is accurate without admitting actions were appropriate.

3. Admit that this Court has jurisdiction, however, it is denied that Jorfui Dolly Kandeh, owner and/or bailee of the Defendant property committed any offenses within the jurisdiction of the Court.

4. Admit venue is proper in this Court under 28 U.S.C. §§ 1335 and 1395(a) but deny any acts or omissions by Jorfui Dolly Kandeh gave rise or need for any forfeiture action.

5. It is specifically denied that Defendant property is subject to forfeiture pursuant to 31 U.S.C. § 5317(c)(2). It is also denied that Jorfui Dolly Kandeh committed any offenses in violation of 31 U.S.C. §§ 5316 and 5324(c).

6. Admit that on March 18, 2010, Jorfui Dolly Kandeh was about to leave the United States with Sierra Leon as her final destination, at the George Bush Intercontinental Airport in Houston, Texas. Admit that on the jetway a United States Customs and Border Protection Officer (CBP Officer) conducted an inspection. It is specifically denied that the CBP Officer asked Jorfui Dolly Kandeh if she was transporting more than \$10,000 in cash for herself or others. It is specifically denied that Jorfui Dolly Kandeh stated verbally and in writing that she was carrying only \$5,000.

7. Admit that a CBP Officer asked Jorfui Dolly Kandeh to place all her money on an inspection table, that she placed several envelopes on the table, and these envelopes contained approximately \$19,629.00. Admit that the CBP Officer seized these funds for forfeiture.

## PRAYER

WHEREFORE, Jorfui Dolly Kandeh, owner and/or bailee of the property subject to this forfeiture, respectfully requests that this Honorable Court dismiss the verified complaint for forfeiture.

Respectfully submitted,

PORTZ & PORTZ

s/ Craig Pena

Craig Pena

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## **Attorney for Jorfui D**

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**CERTIFICATE OF SERVICE**  
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3 I hereby certify that a true and correct copy of the above and foregoing document was  
4 served via hand delivery and/or certified mail return receipt requested to the Assistant United  
5 States Attorney on June 25, 2010.  
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s/ Craig Pena  
Craig Pena

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